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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92047977
Party	Defendant National Notification Network, LLC
Correspondence Address	National Notification Network, LLC 505 North Brand Blvd., Suite 700 Glendale, CA 91203 UNITED STATES
Submission	Answer
Filer's Name	Steven M. Weinberg
Filer's e-mail	smweinberg@ggfirm.com
Signature	/Steven M. Weinberg/
Date	10/17/2007
Attachments	92047977Response toPetition.pdf (6 pages)(139482 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re Registration No. 3087494

3M Company)	Opposition Number 92047977
)	
Petitioner,)	RESPONSE TO CANCELLATION
)	PETITION
vs.)	
)	
National Notification Network, LLC)	
)	
Registrant.)	
)	
)	
)	

TO: ASSISTANT COMMISSIONER FOR TRADEMARKS
BOX TTAB - NO FEE
P.O. Box 1451
Alexandria, VA 22313-1451

For its Response to the Cancellation Petition of 3M Company ("Opposer"), Registrant National Notification Network, LLC ("Registrant"), admits, denies and alleges as follows:

1. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1 of the Petition, and therefore denies same.

2. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2 of the Petition, and therefore denies same.

3. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 of the Petition, and therefore denies same.

Response to Petition to Cancel
Proceeding Number **92047977**
Page 1

4. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 of the Petition, and therefore denies same.

5. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 of the Petition, and therefore denies same.

6. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6 of the Petition, and therefore denies same.

7. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7 of the Petition, and therefore denies same.

8. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8 of the Petition, and therefore denies same.

9. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 9 of the Petition, and therefore denies same.

10. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 10 of the Petition, and therefore denies same.

11. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11 of the Petition, and therefore denies same.

12. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12 of the Petition, and therefore denies same.

13. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13 of the Petition, and therefore denies same.

14. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14 of the Petition, and therefore denies same.

15. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15 of the Petition, and therefore denies same.

16. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16 of the Petition, and therefore denies same.

17. Registrant admits that Opposer owns federal registrations of the 3M mark, but denies that any of those registrations are relevant to this proceeding, and is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in the Paragraph 17 of the Petition, and therefore denies same.

18. Registrant admits the allegations in Paragraph 18 of the Petition, except that Registrant denies having any knowledge of any use by Petitioner of the 3M mark that has any relevance to this proceeding.

19. Registrant admits that it markets its services but otherwise denies the allegations in Paragraph 19 of the Petition.

20. Registrant admits that its services are used in connection with mass communication in many situations, and denies the remaining allegations in Paragraph 20 of the Petition.

21. Registrant admits the allegations in Paragraph 21 of the Petition.

22. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22 of the Petition, and therefore denies same.

23. Registrant denies that Registrant was aware of any use of the 3M mark that it relevant to this proceeding.

24. Registrant denies the allegations in Paragraph 24 of the Petition.

25. Registrant denies the allegations in Paragraph 25 of the Petition, and therefore denies same.

26. Registrant denies the allegations in Paragraph 26 of the Petition.

27. Registrant denies the allegations in Paragraph 27 of the Petition.

28. Registrant denies the allegations in Paragraph 28 of the Petition.

29. Registrant denies the allegations in Paragraph 29 of the Petition.

Affirmative Defense

1. Opposer has failed to state any claim upon which relief may be granted.

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WHEREFORE, Registrant respectfully prays the Petition be denied.

Dated this 17th day of October , 2007.

Respectfully submitted,


By: 

Steven M. Weinberg
Greenberg Glusker Fields Claman & Machtinger LLP
1900 Avenue Of The Stars
21st Floor
Los Angeles, CA 90067
Tel: 310.553.3610
Fax: 310.553.0687

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and complete copy of the Response to the Petition was served on opposing counsel by email to:

Michael Metteauer, Esq.
Fulbright & Jaworski, LLP
600 Congress Avenue, Suite 2400
Austin, TX 78701
mmetteauer@fulbright.com



Steven M. Weinberg

Dated: October 17, 2007
 Los Angeles CA